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January 27, 2017

## VIA ELECTRONIC FILING

Public Utility Commission of Oregon 201 High Street SE, Suite 100 P.O. Box 1088 Salem, Oregon 97308-1088

Re:

Docket No. UE 316

Recovery of Costs Associated with North Valmy Power Plant

**Attention Filing Center** 

Idaho Power requests that the enclosed Errata – page 5 of Idaho Power Company's ("Idaho Power" or "Company") Application for Recovery of Costs Associated with North Valmy Power Plant be substituted for page 5 of the Company's original Application filed November 2, 2016.

The Application contains an error on page 5, lines 4 through 7, in the reference to the average price Idaho Power received for off-system sales in 2011, 2015, and year-to-date 2016. This is the same error that was corrected in the Direct Testimony of Tom Harvey on December 23, 2016. The change has no impact on the economic analyses performed regarding the operating life of Valmy or the conclusions presented by Idaho Power in its original filing.

If you have any questions regarding the corrected page or this matter, please do not hesitate to contact me.

Very truly yours,

Wendy McIndoo Wendy McIndoo Office Manager

**Enclosures** 

## **ERRATA PAGE 5 – REDLINED VERSION**

IN THE MATTER OF THE APPLICATION OF IDAHO POWER COMPANY FOR AUTHORITY TO INCREASE ITS RATES FOR ELECTRIC SERVICE TO RECOVER COSTS ASSOCIATED WITH THE NORTH VALMY POWER PLANT

1	dates and determine if a date could be established to cease coal-fired operations. This filing
2	will synchronize depreciation rates between the two companies.
3	Significant changes in Valmy operations have occurred between 2010 and 2014. In

Significant changes in Valmy operations have occurred between 2010 and 2014. In 2011, the average price Idaho Power received for off-system sales was \$22.7124.56 per MW compared to 2015 when the average price Idaho Power received for off-system sales was only \$11.8219.57 per MW. Moreover, year-to-date 2016, Idaho Power's average price for off-system sales is only \$8.7615.77 per MW. In addition to reducing off-system sales, the significant decrease in market prices has resulted in a decrease in the number of hours Valmy operates economically, as the dispatch cost is now typically higher than the market price. Rather than a resource used to generate off-system sales, Idaho Power has been relying on Valmy to meet the Company's peak energy needs, preserving the balanced portfolio needed to reliably serve Idaho Power customers during all types of system conditions.

As shown in the preferred portfolio of Idaho Power's 2015 IRP, the economics of Valmy's operation are impacted in the long term as new resources such as B2H or other operating facilities are available to maintain the balanced portfolio required to serve load reliably. Idaho Power relies on Valmy to meet peak energy needs and to preserve the balanced portfolio needed to reliably serve customers during all types of system conditions. When extreme cold weather or extreme hot temperatures occur in the West, Valmy is providing reliable energy and capacity to serve customers. Idaho Power will continue to rely on Valmy during similar circumstances in the future as load increases in the Company's service territory and until the addition of new resources are available during peak hours or 22 can provide additional transmission capacity.

In 2016, Idaho Power assessed continued use of the 2025 end-of-life assumption for Valmy using an updated evaluation of the present value revenue requirement of operating

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<sup>&</sup>lt;sup>1</sup> In the Matter of Idaho Power Company's 2015 Integrated Resource Plan, Docket No. LC 63, Order No. 16-160 Appx. B at 1 (Apr. 28, 2016).

## **ERRATA PAGE 5 – CLEAN VERSION**

IN THE MATTER OF THE APPLICATION OF IDAHO POWER COMPANY FOR AUTHORITY TO INCREASE ITS RATES FOR ELECTRIC SERVICE TO RECOVER COSTS ASSOCIATED WITH THE NORTH VALMY POWER PLANT

1	dates and determine if a date could be established to cease coal-fired operations. <sup>1</sup> This filing
2	will synchronize depreciation rates between the two companies.

3 Significant changes in Valmy operations have occurred between 2010 and 2014. In 2011, the average price Idaho Power received for off-system sales was \$24.56 per MW compared to 2015 when the average price Idaho Power received for off-system sales was only \$19.57 per MW. Moreover, year-to-date 2016, Idaho Power's average price for offsystem sales is only \$15.77 per MW. In addition to reducing off-system sales, the significant decrease in market prices has resulted in a decrease in the number of hours Valmy operates economically, as the dispatch cost is now typically higher than the market price. Rather than 10 a resource used to generate off-system sales, Idaho Power has been relying on Valmy to meet the Company's peak energy needs, preserving the balanced portfolio needed to reliably 11 12 serve Idaho Power customers during all types of system conditions.

As shown in the preferred portfolio of Idaho Power's 2015 IRP, the economics of Valmy's operation are impacted in the long term as new resources such as B2H or other operating facilities are available to maintain the balanced portfolio required to serve load 16 reliably. Idaho Power relies on Valmy to meet peak energy needs and to preserve the balanced portfolio needed to reliably serve customers during all types of system conditions. When extreme cold weather or extreme hot temperatures occur in the West, Valmy is 19 providing reliable energy and capacity to serve customers. Idaho Power will continue to rely on Valmy during similar circumstances in the future as load increases in the Company's service territory and until the addition of new resources are available during peak hours or 22 can provide additional transmission capacity.

23 In 2016, Idaho Power assessed continued use of the 2025 end-of-life assumption for 24 Valmy using an updated evaluation of the present value revenue requirement of operating

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<sup>&</sup>lt;sup>1</sup> In the Matter of Idaho Power Company's 2015 Integrated Resource Plan, Docket No. LC 63, Order No. 16-160 Appx. B at 1 (Apr. 28, 2016).